

# Sage Legal LLC

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November 28, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Cheryl L. Pollak, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13B South  
Brooklyn, NY 11201-1804

**Re: Ortega v. Champagne Room BK, Inc., et al.**  
**Case No.: 1:21-cv-1125 (NGG) (CLP)**

Dear Judge Pollak:

This office represents the Plaintiff Iuminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes pursuant to this Court’s Orders to provide a letter regarding her amended complaint.

On August 31, 2024, Plaintiff served upon counsel for Yeghoyan, former counsel to CRBK, and *pro se* Defendant Sarkis Avoyants (“Avoyants”) a draft Fourth Amended Complaint. Pursuant to this Court’s Order, CRBK, Yeghoyan, and Avoyants was to indicate whether he objected to the proposed amendments on or before September 7, 2024. Avoyants failed to do so. As such, this Court should permit Plaintiff to amend the complaint.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
November 28, 2024

Respectfully submitted,  
**SAGE LEGAL LLC**  
/s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
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*Attorneys for Plaintiff*  
*Ortega Iuminada*

Enclosure.

**VIA CERTIFIED MAIL**

Sarkis Avoyants  
233 Avenue W  
Brooklyn, NY 11223

**VIA ECF**

All counsel of record

## Emanuel Kataev

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**From:** Emanuel Kataev  
**Sent:** Saturday, August 31, 2024 5:14 PM  
**To:** Elena Fast; victor@vicslaw.com; smngmtgroup@gmail.com  
**Cc:** Jonathan Shalom  
**Subject:** Re: Ortega v. Champagne Room BK, Inc., et al.; Case No.:  
**Attachments:** 2024-08-31 Draft Joint Status Report.docx; 2024-08-31 Ps Fourth Amended Complaint.pdf; 2024-04-30 087 USMJ Order.pdf; 2024-08-07 093 USMJ Order.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Counselors and Mr. Avoyants:

Please see attached draft joint status report and Plaintiff's proposed fourth amended complaint together with a courtesy copy of the Court's April 30, 2024 and August 7, 2024 Orders.

I am meeting-and-conferring with counsel for Defendant Ruben Yeghoyan on Tuesday, September 3, 2024 at 2:30 PM and welcome you to join our conference then to discuss these matters.

The joint status report is due on Friday, September 6, 2024; I welcome any revisions to the attached draft in redline before or after our telephonic meet-and-confer.

Regards,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**  
**Emanuel Kataev, Esq., P.C.**  
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